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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 Amy Ehrlich,) Case No.
12)
13 Plaintiff,) **COMPLAINT AND TRIAL BY JURY**
14) **DEMAND**
15 vs.)
16)
17 Virtuoso Sourcing Group, LLC,)
18)
19 Defendant.)

20 **NATURE OF ACTION**

21 1. This is an action brought under the Fair Debt Collection Practices Act
22 (“FDCPA”), 15 U.S.C. § 1692 *et seq.*

23 **JURISDICTION AND VENUE**

24 2. This Court has jurisdiction under 15 U.S.C. § 1692k(d) and 28 U.S.C. §
25 1331.

26 3. Venue is proper before this Court pursuant to 28 U.S.C. §1391(b), where
27 the acts and transactions giving rise to Plaintiff’s action occurred in this district, (where
28 Plaintiff resides in this district), and/or where Defendant transacts business in this district.

PARTIES

4. Plaintiff, Amy Ehrlich (“Plaintiff”), is a natural person who at all relevant times resided in the State of Arizona, County of Maricopa, and City of Phoenix.

5. Plaintiff is a “consumer” as defined by 15 U.S.C. § 1692a(3).

6. Defendant, Virtuoso Sourcing Group, LLC (“Defendant”) is an entity who at all relevant times was engaged, by use of the mails and telephone, in the business of attempting to collect a “debt” from Plaintiff, as defined by 15 U.S.C. §1692a(5).

7. Defendant is a “debt collector” as defined by 15 U.S.C. § 1692a(6).

FACTUAL ALLEGATIONS

8. Plaintiff is a natural person obligated, or allegedly obligated, to pay a debt owed or due, or asserted to be owed or due a creditor other than Defendant.

9. Plaintiff's obligation, or alleged obligation, owed or due, or asserted to be owed or due a creditor other than Defendant, arises from a transaction in which the money, property, insurance, or services that are the subject of the transaction were incurred primarily for personal, family, or household purposes. Plaintiff incurred the obligation, or alleged obligation, owed or due, or asserted to be owed or due a creditor other than Defendant.

10. Defendant uses instrumentalities of interstate commerce or the mails in a business the principal purpose of which is the collection of any debts, and/or regularly collects or attempts to collect, directly or indirectly, debts owed or due, or asserted to be owed or due another.

1 d) Awarding Plaintiff reasonable attorneys' fees and costs incurred in this
2 action;

3
4 e) Awarding Plaintiff any pre-judgment and post-judgment interest as may be
5 allowed under the law;

6 f) Awarding such other and further relief as the Court may deem just and
7 proper.
8

9 **TRIAL BY JURY**

10 Plaintiff is entitled to and hereby demands a trial by jury.

11
12 Respectfully submitted this 29th day of July, 2011

13 By: s/ Marshall Meyers
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